

**IN THE UNITED STATES DISTRICT COURT
FOR EASTERN DISTRICT OF PENNSYLVANIA**

**STEVEN BELT and GRACE CASTRO,
individually and on behalf of all others
similarly situated and the Putative Classes**

Civil Action No.: 18-3831-AB

Plaintiffs,

v.

P.F. CHANG'S CHINA BISTRO, INC.
Defendant.

**JOINT MOTION TO PRELIMINARILY APPROVE FAIR LABOR STANDARDS ACT
SETTLEMENT AND TO VOLUNTARILY DISMISS STATE LAW CLAIMS**

Plaintiffs Steven Belt and Grace Castro, on behalf of themselves and all others similarly situated, and Defendant P.F. Chang's China Bistro, Inc. jointly bring this Motion to Preliminarily Approve Fair Labor Standards Act Settlement and to Voluntarily Dismiss State Law Claims. This motion is based upon the accompanying Memorandum in Support, Declaration of Daniel S. Brome with accompanying exhibits, and all of the files, records and proceedings herein, as well as further points and authorities presented to this Court.

Date: May 16, 2024

NICHOLS KASTER, PLLP

s/ Daniel S. Brome

Reena I. Desai, MN Bar # 0388311*

4600 IDS Center, 80 S. 8th Street

Minneapolis, Minnesota 55402

Telephone (612) 256-3244

Email: rdesai@nka.com

Daniel S. Brome, CA Bar # 278915*

235 Montgomery St., Suite 810
San Francisco, CA 94104
Telephone (415) 277-7235
Email: dbrome@nka.com

**Admitted pro hac vice*

SCHALL & BARASCH

Patricia A. Barasch
110 Marter Ave #302
Moorestown, NJ 08057
Telephone: (856) 914-9200
Email: pbarasch@schallandbarasch.com

ATTORNEYS FOR PLAINTIFFS
AND THE PUTATIVE COLLECTIVE AND
CLASS ACTIONS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above was filed electronically on May 16, 2024 pursuant to the service requirements of the ECF/CM for the Eastern District of Pennsylvania, which will notify all counsel of record.

s/ Daniel S. Brome
Daniel S. Brome